

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASES
ON THE EXHIBITS ATTACHED HERETO

**JOINT MOTION TO DISMISS DEFENDANT COLOPLAST CORP.
WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant Coloplast Corp. (“Coloplast”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims, and third party claims. Accordingly, Plaintiffs and Coloplast jointly move the court to dismiss Coloplast as a defendant in these actions with prejudice, and terminate Coloplast from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Date: November 13, 2015

Respectfully submitted,

/s/ Lana K. Varney

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EXHIBIT A – LEVIN SIMES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-10557	Janice and Kevin Schirmer v. Ethicon, Inc., et al..
2:13-cv-16409	Ruby Boyd Simpkins v. Ethicon, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Lana K. Varney

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